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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SAN JUAN ANA

BY _____

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL BAKER,

Defendant.

No. SA CP

I N F O R M A T I O N

[18 U.S.C. § 371: Conspiracy]

SACR 14-00041

The United States Attorney charges:

[18 U.S.C. § 371]

A. INTRODUCTION

1. At all times relevant to this information, defendant DANIEL BAKER ("BAKER") was co-owner of CalPacific Equity Group LLC ("CalPacific") located in Valencia, California.

B. THE OBJECT OF THE CONSPIRACY

2. Beginning in or around September 2011, and continuing to in or around February 2012, in Orange County, within the Central District of California, and elsewhere, defendant BAKER, D.D., S.R., and P.K., together with others known and unknown to the United States Attorney, combined, conspired, and agreed with each other to knowingly and intentionally commit an offense

1 against the United States, namely, mail fraud by shipping
2 through private and interstate mail carriers documents related
3 to an investment fraud scheme, in violation of Title 18, United
4 States Code, Section 1341.

5 C. THE MANNER AND MEANS OF THE CONSPIRACY

6 3. The object of the conspiracy was carried out, and to
7 be carried out, in substance, as follows:

8 a. Defendant BAKER and D.D. contacted prospective
9 investors to solicit them to purchase Thought Development, Inc.
10 ("TDI") common stock.

11 b. Defendant BAKER and D.D. did not disclose to
12 potential investors that CalPacific was receiving at least a 40%
13 commission on the sales of TDI stock and affirmatively
14 misrepresented that fact.

15 c. Defendant BAKER and D.D., through CalPacific,
16 received \$220,935.50 in investor funds as commissions for
17 selling TDI stock.

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D. OVERT ACT

4. In furtherance of the conspiracy and to accomplish its object, defendant BAKER and D.D., together with others known and unknown to the United States Attorney, committed and willfully caused others to commit the following overt act, among others, in Orange County, within the Central District of California, and elsewhere:

Overt Act No. 1: On or about November 16, 2011, defendant and D.D. caused investor R.B. to send, by Federal Express, a cashier's check in the amount of \$10,000 to purchase 4,000 shares of TDI stock.

ANDRÉ BIROTTE JR.
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